

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Charlottesville Division**

JASON YOAKAM,

Plaintiff,

v.

CASE NO. 3:21cv31

VIRGINIA DEPARTMENT OF  
CORRECTIONS, *et al.*,

Defendants.

**STIPULATION OF DISMISSAL WITH PREJUDICE**

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiff and Defendants hereby file this joint stipulation of dismissal with prejudice, with each party bearing their own fees and costs.

Pursuant to *Kokkonen v. Guardian Life Insurance of America*, 511 U.S. 375 (1994), this Stipulation explicitly reserves jurisdiction in this Court to enforce the terms of the settlement agreement for a period of three months from the date of the execution of this Stipulation of Dismissal.

Dated: January 14, 2022

Respectfully submitted,

*s/ Richard Saenz*  
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**CERTIFICATE OF SERVICE**

I electronically filed the forgoing document with the clerk of court for the United States District Court for the Western District of Virginia on January 14, 2022, using the CM/ECF system, which will send notification of such filing to all CM/ECF registered attorneys on the NEF.

s/ Laura Maughan  
Laura Maughan (VSB No. 87798)  
Assistant Attorney General